

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known as
THE ROYAL BANK OF SCOTLAND, N.V.),

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05354 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant ABN AMRO Bank N.V. (presently known as The Royal Bank Of Scotland, N.V.) (“Defendant”) may answer, move against, or otherwise respond to the Trustee’s amended complaint (“Amended Complaint”) is extended up to and including June 30, 2014. The pre-trial conference will be adjourned from July 30, 2014, at 10:00 a.m. to August 27, 2014, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for the Defendant to answer, move against, or otherwise respond to the Amended Complaint. Nothing in this Stipulation is a waiver of the Defendant’s right to request from the Court a further extension of time to answer, move against, or otherwise respond to the Amended Complaint and/or the Trustee’s right to object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 5600).

[Remainder of page intentionally left blank.]

Dated: April 11, 2014
New York, New York

/s/ Thomas L. Long

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Thomas L. Long

Email: tlong@bakerlaw.com

Regina L. Griffin

Email: rgriffin@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

/s/ Brian de Haan

ALLEN & OVERY LLP

1221 Avenue of the Americas

New York, New York 10020

Telephone: (212) 610-6300

Facsimile: (212) 610-6399

Michael Feldberg

Email: michael.feldberg@allenovery.com

Brian de Haan

Email: brian.dehaan@allenovery.com

*Attorneys for Defendant ABN AMRO Bank N.V.
(presently known as The Royal Bank Of Scotland,
N.V.)*